

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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CHAD PELISHEK,

Plaintiff,

v.

Case No. 23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

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**DECLARATION OF WARREN E. BULIOX IN SUPPORT OF DEFENDANTS' CIVIL  
L.R. 7(H) EXPEDITED NON-DISPOSITIVE MOTION  
TO TEMPORARILY STAY DEFENDANTS' RESPONSE TO PLAINTIFF'S  
RULE 37 MOTION AND RELATED FILINGS OR ENLARGE THE TIME  
DEFENDANTS HAVE TO RESPOND TO THE SAME**

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I, Warren Buliox, pursuant to 28 U.S.C. Sec. 1746, hereby depose and state under penalty of perjury as follows:

1. I am an attorney at the law firm of MWH Law Group LLP and an adult resident of the State of Wisconsin. I am one of the attorneys of record for the Defendants in this matter and I make this Declaration based upon my personal knowledge or information provided to me.
2. I am primarily responsible for responding to Plaintiff's Motion for Sanctions under Rule 37 or in the alternate Motion to Compel Discovery (the "Rule 37 Motion") (ECF No. 57) and Plaintiff's Objection under Civil L.R. Rule 79(d) (ECF No. 60.)
3. I had an unexpected family medical emergency that developed in October of 2024 that resulted in my wife's grandmother being placed on a life support apparatus, removed from the life supporting apparatus on October 29, 2024, placed in what I understand was hospice afterwards

and passing away on November 10, 2024. I first mentioned the matter to Plaintiff's counsel on October 27, 2024.

4. While my firm has other lawyers and while others are assisting in responding to the above-referenced motions, these lawyers have other full-time commitments and/or lack familiarity with the case in general or with discovery issues particular to this case.

5. Voluminous documents have been reviewed and/or produced in this matter, numerous sets of discovery have been issued on the Defendants and there have been numerous communications with Plaintiff's counsel regarding discovery related matters.

6. On October 31, 2024, Defendant Charles Adams was deposed and, on November 8, 2024, Defendant Ryan Sorenson was deposed. I recall during a break in one of these depositions and following these depositions becoming aware through Plaintiff's counsel that she intended to use material from these depositions to supplement Plaintiff's Rule 37 Motion and/or for use in a Reply Brief in connection with Plaintiff's Rule 37 Motion.

7. Deposition transcripts have been ordered for both depositions and a copy of Defendant Adams' deposition transcript was received last evening at 9:41pm. Defendant Sorenson's deposition transcript has yet to be received.

Dated at Milwaukee, Wisconsin this 12<sup>th</sup> day of November, 2024.

/s Warren E. Buliox

Warren E. Buliox